

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

XTC CABARET (DALLAS), INC. D/B/A
XTC CABARET; FINE DINING CLUB,
INC. D/B/A SILVER CITY CABARET;
COASTER LINE COASTER CLUB INC.
D/B/A TIGER CABARET; GUILLERMO
BELTRAN DEL RIO TIRADO;
DEDRICK NERO; RICHARD
BOTHMANN, JR.; LUXX
ENTERTAINMENT, LLC D/B/A MR.
LUXX; AND JESUS HERNANDEZ,

Plaintiffs,

V.

THE CITY OF DALLAS AND THE CITY
OF DALLAS POLICE DEPARTMENT,

Defendants.

CIVIL ACTION NO. _____

DECLARATION OF FERNANDO GALDAMEZ

1. My name is Fernando Galdamez. I am over the age of twenty-one (21) years and am fully competent to make this affidavit. All statements contained in this declaration are true and correct and are based on my personal knowledge.

2. I am an employee of XTC Cabaret. On or around November 27, 2023, a Dallas police officer came into XTC Cabaret and handed me a letter from the City of Dallas. The officer then verbally informed and threatened me that XTC Cabaret cannot be open past 2:00 a.m. and if the Police Department sees XTC Cabaret open past 2:00 a.m., I would be fined or go to jail. I have read the foregoing Complaint and Application for Preliminary and Permanent Injunctive Relief and every factual statement in it relating to XTC Cabaret is true and correct.

3. I, Fernando Galdamez, declare under penalty of perjury that the above is true and correct and based on my personal knowledge. I am executing this declaration within the territorial limits of the United States of America.

EXECUTED on December 26, 2023.

Fernando Galdamez